

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

THELMA JONES, PRIYIA LACEY, FAISA
ABDI, ALI ALI, RUKIYA HUSSEIN, LUCIA
PORRAS, DAVID TROTTER-FORD, AND
SOMALI COMMUNITY RESETTLEMENT
SERVICES, INC.,

Plaintiffs,

v.

CITY OF FARIBAULT,

Defendant.

Case No. 18-CV-01643 (JRT/HB)

JOINT STIPULATION TO
EXTEND DISCOVERY
DEADLINE

The parties jointly move the Court for an order extending by nine days the deadline to complete fact discovery. As grounds for this Stipulation, the parties state:

1. The Court issued a scheduling order on September 25, 2018 setting a deadline of June 19, 2019 for the completion of fact discovery. ECF No. 21.
2. Since the Court issued the scheduling order, the parties have diligently pursued discovery. The parties have propounded and responded to interrogatories and requests for production, produced responsive documents, and conferred repeatedly regarding various discovery issues. The parties have also negotiated over, and agreed upon, stipulations of fact that have enabled the parties to focus the scope of discovery.
3. These efforts notwithstanding, several new issues related to the production of documents have arisen as a result of the parties' recent depositions. The

parties have opted to cancel scheduled depositions in order to meet and confer on these issues. As a result, the parties need a brief extension of time to complete document production and to conduct a limited number of focused depositions. Given the need to complete document discovery before conducting the depositions, and the time required to identify and prepare witnesses for depositions, a nine-day extension of the discovery period is warranted.

4. The parties therefore jointly request that the case schedule be amended as follows:

- a. June 28, 2019: Close of fact discovery.

5. Accordingly, because good cause exists for a nine-day extension of the discovery period, the parties jointly move to extend the deadline for discovery until June 28, 2019, in accordance with MN Local Rule 16.3.

Dated: June 5, 2019

Respectfully submitted,

AMERICAN CIVIL LIBERTIES
UNION FOUNDATION

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